

May 23, 2011

Via Electronic Submission

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: **Ex Parte Statement:**
 Petitions for Declaratory Ruling Regarding Public, Educational
 and Governmental Programming, MB Docket No. 09-13; Annual
 Assessment of the Status of Competition in the Market for the
 Delivery of Video Programming, MB Docket No. 07-269.

Dear Ms. Dortch:

As a long-standing member of the AT&T Advisory Panel on Access and Aging (“AAPAA”), I read with interest the article in the May 20 edition of Communications Daily about criticism by the PEG community of AT&T’s accessibility efforts. The issue of inaccessible user interfaces of TV set-top boxes is one that affects more than just PEG networks – in fact most menus and electronic program guides for cable, satellite and telecom video systems have been recognized as a major barrier to blind and visually impaired consumers. That’s why the “21st Century Communications and Video Accessibility Act” (“CVAA”), passed by the last Congress and signed by President Obama last fall, included a strong mandate to make these devices fully accessible. AT&T was one of the first supporters of this ground-breaking legislation and helped usher it through many rounds of negotiations.

To implement the requirements of the bill, the FCC established the Video Programming Accessibility Advisory Committee (“VPAAC”); AT&T is a member of this committee and is dedicating much time and effort to its deliberations which will result in recommendations for implementing the accessible set-top box provisions. Following a schedule set forth in the bill, the FCC will issue rules which will require audible access to all menus.

But even before the CVAA was passed, AT&T contracted outside experts to analyze its U-verse access services and features and put into a development cycle several recommendations to improve the accessibility of its service. (I know because it was my non-profit organization which performed this analysis.) Accessible user interfaces are an issue not only for television services, but for mobile devices and web sites as well. AT&T has made tremendous progress over the past few years in assuring that blind and visually impaired people can readily use its cell phones (as is required by law) and has instituted one of the most significant and effective corporate initiatives to bring its hundreds of

thousands of web sites and pages into conformity with the W3C's Web Content Accessibility Guidelines.

The issues surrounding channel placement for PEG channels on the U-verse service should be argued on their own merits. By raising accessibility arguments, the PEG community is not standing on firm ground: AT&T's commitment to fully inclusive products and services is among the strongest in all of corporate America.

Sincerely,

A handwritten signature in black ink, reading "Larry Goldberg". The signature is written in a cursive, flowing style.

Larry Goldberg, Director
The Carl and Ruth Shapiro Family
National Center for Accessible Media at WGBH (NCAM)

cc: Bill Lake
Michelle Carey
Mary Beth Murphy
Alison Neplokh
John Norton
Holly Sauer